

CITY COUNCIL CITY OF CHICAGO

COUNCIL CHAMBER CITY HALL* 2ND FLOOR 121 NORTH LASALLE STREET CHICAGO. ILLINOIS 60602

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FINANCE

November 15, 2019

Chicago Board of Ethics c/o Steven I. Berlin, Executive Director 740 N. Sedgwick St., 5th Floor Chicago, IL 60654

Dear Mr. Berlin:

I am writing to inform the Board of Ethics ("Board") that my vote was inadvertently recorded at the October 16, 2019, City Council Meeting for an Ordinance concerning a matter which I should have recused myself from voting on. Please allow this letter to serve as my official notice to the Board of my recusal per Section 2-156-080 of the Governmental Ethics Ordinance.

The Ordinance in question is Ordinance O2019-7183, which granted a non-exclusive easement to Commonwealth Edison Company for property at 3540 S. Michigan Ave. Commonwealth Edison was a client of Stratagem Consulting Group, LLC ("Stratagem"), between January 4, 2019, and October 3, 2019. To be clear at the time of the vote, Commonwealth Edison Company was no longer a Stratagem client and I was still in the process of divesting myself from Stratagem. Rather, the reporting Committee Chairman called for its passage using an uncontested "reference vote" on an unrelated matter taken earlier in the meeting. Because I was not called upon to affirmatively vote on this item, my attention was elsewhere and I simply overlooked it.

My staff and I will work to ensure that, should this or a similar situation arise again, I will recuse myself and report my recusal to the Board per Section 2-156-080 of the Ethics Ordinance. I rely on my staff to notify me of any items that require recusal. In this case, that did not occur, and my office has implemented additional procedures as safeguards to ensure that this will not happen again. I would also like to inform the Board that, as of November 9, 2019, I have fully divested myself from Stratagem.

Please post this letter on the Board's website under the Aldermanic Disclosures section and feel free to call me at any time if you have any questions concerning this matter. Thank you.

Sincerely,

Gilbert Villegas

Alderman of the 36th Ward

Chairman of the Committee on Economic, Capital, and Technology Development

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